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November 22, 2013

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**VIA ECF and OVERNIGHT Mail**

Honorable Robert D. Drain  
United States Bankruptcy Judge  
United States Bankruptcy Court  
300 Quarropas Street  
White Plains, New York 10601-4140

RE: In re: Romanoff Chapter 11 Case No. 13-23897

Dear Judge Drain:

We are proposed counsel to Robert S. Romanoff, the debtor in the above-referenced chapter 11 case. We write this letter in response to 55 Gans Lender LLC's ("55 Gans") request, dated November 21, 2013, to transfer Mr. Romanoff's case to Bankruptcy Judge Robert E. Gerber in the Southern District of New York, Manhattan Division.

We believe that 55 Gans' request to transfer the case is inappropriate. The facts and circumstances of In re GHC NY Corp., Case No. 12-14031 (the "GHC Bankruptcy") are distinctly different from Mr. Romanoff's current bankruptcy case. The GHC Bankruptcy involved Mr. Romanoff in his capacity as a representative of GHC and the foreclosure of a property owned by GHC NY Corp. The Romanoff bankruptcy was initiated due to the impending judgment lien sale of real property owned by Mr. Romanoff. Additionally, the GHC Bankruptcy has been dismissed and is no longer pending before Judge Gerber and therefore serves as no basis to relate this case back to Judge Gerber. Similar "players" are not a reason for transfer. Accordingly, the facts and circumstances as to the GHC Bankruptcy are not applicable to Mr. Romanoff's case.

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Venue is appropriate in the Southern District of New York, White Plains Division, as Mr. Romanoff owns property in Rye, New York, which is currently his principal place of business as it is a significant source of his personal income. Additionally, as the case progresses, Mr. Romanoff may have to take up residence at the Rye address. Pursuant to the local bankruptcy rules, cases involving debtors located in Rye, which is located in Westchester County, are appropriately assigned to this Court.

In light of the above, we believe that a transfer to Judge Gerber is unnecessary and, without a formal motion, the request is in the wrong form.

Respectfully submitted,

/s/Robert M. Sasloff

RMS:tef

cc. William F. Savino, Damon Morey LLP  
United States Trustee for the Southern District of New York